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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services	)	CC Docket No. 98-67
and Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	

AT&T COMMENTS

Pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, AT&T Corp. ("AT&T") submits these comments on the Commission's Further Notice in this proceeding,[1] proposing additional modifications to the manner in which telecommunications relay service ("TRS") is currently offered.

I. Nationwide 800 Access to STS

In its companion Report and Order in this proceeding, the Commission concluded that speech-to-speech ("STS") relay service falls within the statutory definition of a "telecommunications relay service" and, thus, must be provided by all common carriers.[2] The Commission also provided carriers approximately a one year

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1 Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67. Report and Order and Further Notice of Proposed Rulemaking, FCC 00-56, released March 6, 2000 ("Report and Order" or "Further Notice").

2 Report and Order, ¶ 15. As the Commission explained (id. ,¶ 14), with STS specially trained communications assistants ("CAs") who understand the speech patterns of persons with speech disabilities repeat the spoken words to the other part in a relay call. This service thus satisfies the statutory standard of a telephone transmission service that enables persons with speech disabilities to communicate in a manner functionally equivalent to persons without that disability. Id., ¶ 15.

period (i.e., until March 1, 2001) in which to deploy STS, but left to providers the determination of the most cost-effective basis on which that service can be provided.[3]

The Further Notice (¶ 126) now seeks comment on the most appropriate dialing method for end users to access STS relay service. The Commission points out (id.) that it has already set aside the 711 dialing prefix for use with TRS applications, and that it has taken steps towards eventual nationwide implementation of that code.[4] However, as the Commission also acknowledges (id.), end users that have commented in this proceeding have expressed a preference for a separate national toll-free (8YY) access number for STS applications.[5]

AT&T supports the establishment of a single, nationwide toll-free 8YY number by each relay service provider to support that entity's offering of in-language STS relay service. This access dialing method will facilitate ready access by end users to their preferred provider of STS relay service; by contrast, dialing via a three-digit access code (i.e., the 711 dialing prefix) will necessarily direct the caller to

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3 Id., ¶ 14 (noting that STS may be offered "by coordinating or centralizing the service in regional speech-to-speech centers, rather than by attempting to provide independent services on a state-by state basis")(footnote omitted).

4 Id. at n. 252, citing Use of N11 Codes and Abbreviated Dialing Arrangements, 12 FCC Rcd 5572 (1997).

5 In addition to prescribing provision of interstate STS service, the Report and Order (¶ 30) mandates provision of relay services (including STS) in Spanish, and makes relay service in other languages reimbursable from the TRS fund. AT&T already offers Spanish-to-Spanish relay in all of the states in which it is the contracted provider of relay service, using a set of national toll-free (8YY) numbers. Based on that experience, AT&T anticipates that users will also prefer to continue using a national toll-free number to access Spanish language STS.

the relay center located in the particular state where the call originates, which may or may not be the end user's preferred STS provider.[6] Providing access to that provider's STS relay service via an single nationwide toll-free number will also avoid further complicating the eventual transition to 711 TRS access (which is only now beginning, on an elective basis, in several states) with the need to accommodate an additional call type via the 711 prefix. For these reasons, AT&T urges the Commission to adopt access to STS via a single, nationwide number maintained for that purpose by each relay provider.[7]

II. Availability of SS7 to TRS Centers

The Further Notice (¶¶ 129) observes that the Signaling System 7 ("SS7") out-of-band signaling protocol now widely deployed in carriers' networks allows customers without hearing and speech impairments to make use of features such as CLASS services, and specifically Caller ID, and tentatively concludes that use of SS7 signaling by TRS centers "will render provision of relay service more functionally equivalent to service provided to voice users." To facilitate such deployment of the SS7 protocol, the Commission also seeks comment (¶ 127) on

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6 Although it is not presently feasible (see Part II infra), if TRS functions are at some future date integrated into the public switched network AT&T believes that it would then be feasible to use a single nationwide access number, such as 711, to route STS traffic to those callers' preferred providers, using LEC databases containing those customers' choice of provider (e.g. PIC)..

7 To assure that callers continue to receive high quality service, AT&T recommends that the Commission permit relay providers to adopt separate toll-free numbers to provide STS relay in English, Spanish, and any other language(s) in which the provider elects to offer relay service.

modification of its rule that limits use of SS7 to carriers, and to include TRS providers as lawful recipients and users of SS7 data.[8]

The SS7 protocol provides an internationally standardized, general purpose Common Channel Signaling ("CCS") system that insures reliable, high-performance transfer of signaling information (even in the face of network disturbances and failures) within and across carrier networks.[9] Technical considerations, and not simply legal barriers embedded in the Commission's rules, are the primary impediment to ready deployment of SS7 by TRS centers. That out-of-band signaling protocol is deployed within a carrier's network but, as the Commission is aware, under current arrangements providers' relay centers are adjuncts loosely coupled to, and located outside of, the public switched network. Thus, in order to make full use of SS7 signaling, not limited to such applications as Caller ID described in the Further Notice (¶ 129), the premises equipment that is used by relay centers, such PBXs, attendant positions, and related support systems would require extensive modification to integrate the TRS centers via SS7 signaling into the public switched network. Complete integration would therefore entail additional hardware and software costing several hundred thousand dollars for each affected

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8 See 47 C.F.R. § 644.1600(f)(describing SS7 as "a carrier to carrier" signaling network).

9 Application-level procedures support call control for both Integrated Services Digital Network ("ISDN") and non-ISDN calls, services associated with both types of calls, transaction oriented information transfer, and management and operations signaling.

center.[10] Moreover, fully integrating TRS into AT&T's switched network in this manner would entail substantially upgrading relay centers' redundancy, at additional cost, to meet existing service levels applicable to carrier network nodal elements.

AT&T believes that requiring these extensive modifications under the current network architecture would impose a significant costs upon TRS providers, and that there are serious questions whether providers would be able fully to recover those substantial additional costs under their present arrangements with state relay centers. Rather than subject providers to this financial burden and uncertainty under the present network architecture, the Commission should require TRS providers and carriers to conduct a technical investigation into reconfiguring TRS for delivery as an integral element the public switched network, similar to carriers' current operator services functions. Such a fundamental redesign of the manner in which relay service is provided will provide relay centers the ability to use the SS7 protocol and will also provide end users the features available with such out-of-band signaling. This integration would also provide TRS customers the complete set of network services available today with SS7 signaling, as well as services being designed for future deployment.

In the interim, however, methods are already available to provide an indication through Caller ID that an incoming call is from a TRS user, as the Further Notice (¶¶ 130-133) seeks to achieve. Specifically, AT&T's TRS centers pass a

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10 AT&T currently operates eight relay centers; thus, the costs of such hardware and software changes would amount to several million dollars for AT&T alone.

surrogate number (800-555-0000) to relay customers to identify AT&T Relay on their Caller ID devices. This procedure allows customers receiving a TRS call to differentiate between relay traffic and telemarketing or other calls that they may not wish to answer (Further Notice, ¶ 130). Although this method does not fully replicate the Caller ID functions available with network-based carrier services,[11] it will provide a proxy for that service pending the incorporation of TRS into the public switched network as a result of the evaluation process described above.

III. Expansion of Outreach

In its Report and Order (¶¶ 103-105), the Commission further clarified that, under its current TRS rules, carriers are obligated to take steps to increase awareness of relay services among the general public, and not merely among consumers with hearing and speech disabilities.[12] The Further Notice tentatively concludes (¶ 134) that a nationwide awareness campaign designed to reach many groups in addition to traditional users would help to improve TRS service and, to that end, seeks comment on amending the role of the Interstate TRS Fund Advisory Council ("Council") to permit that body to establish procedures and funding for "a coordinated national outreach campaign." The Commission also seeks comment

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11 Caller Name Delivery (CLAM), which is related to Caller ID, is not supplied under this procedure, because "name" detail is derived via local nodal network control points ("NCPs") at the destination number. An 8YY number may or may not be registered in the local database, and "name" information therefore cannot be guaranteed with 8YY numbers.

12 This obligation includes relay services, such as STS, that the Commission has now added to the panoply of traditional TTY-based relay service. Id., ¶ 105.

(¶ 136) on whether state TRS programs should be required to include and budget for outreach efforts to qualify for certification by the Commission

AT&T strongly supports the Commission's proposed expansion of the Council's authority and mission to develop and fund a coordinated national outreach campaign. A national campaign managed on this centralized basis should maximize the successful dissemination of information on existing and new TRS services to the public at large in a cost-effective manner.[13] Moreover, because expertise in marketing and advertising were not explicit criteria for membership at the time the Council was established,[14] the Commission should make clear that the Council is

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13 For this reason, AT&T also strongly supports integrating into the overall TRS outreach effort the existing programs to educate customers about alternatives to the use of coin sent-paid service as a payment method for TRS. See Telecommunications Relay Service and the Americans with Disabilities Act of 1990, CC Docket No. 90-571, Order, DA 99-1682, released August 20, 1999 (continuing" Alternative Plan" for coin calling first adopted in 1995). Such integration will avoid duplication of effort, promote more effective dissemination and customer understanding, and assure that the two programs' funds are spent most effectively. By supporting integration of the two programs, AT&T does not propose to eliminate separate customer education efforts with respect to coin payment alternatives; rather, AT&T expects to continue those efforts as needed in conjunction with the overall TRS outreach program. However, integration of the two programs could obviate the ongoing need for the Coin Sent Paid ("CSP") Industry Team that now administers aspects of the Alternative Plan.

14 As currently constituted, the Council is a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (both voice and TT), interstate service providers, state representatives and TRS providers. It now meets at least semi-annually to monitor TRS cost recovery matters, but its authority does not include other issues. See 47 C.F.R. § 64.604(c)(iii)(H); Telecommunications Relay Services, and the Americans with disabilities Act of 1990, 8 FCC Rcd 5300, 5301 (1993)(directing NECA, as TRS Fund Administrator, to establish advisory committee). As the Commission has recognized, the Council's present role

(footnote continued on following page)

authorized to retain appropriate consultants (at reasonable compensation) to obtain needed advice on these disciplines for a successful outreach program.

AT&T also supports the Commission's objective of requiring state relay programs also to perform outreach efforts, and making the inclusion and budgeting for such outreach efforts a requirement for program certification. however, for the present the Commission should refrain from mandating such activities, for two reasons.

First, state outreach programs should be expected to supplement the work of the national campaign; thus, until the national campaign is developed, state TRS programs cannot determine how best to deploy their own resources to complement the Interstate TRS Fund's effort. Second, experience with states that have voluntarily implemented outreach efforts, such as [name(s) of state(s)], indicates that those programs prefer to fund and retain advertising agencies or similar entities to provide the specialized expertise in marketing/advertising required for an effective outreach initiative, rather that assign that role to their contracted TRS providers. Thus, even once the national campaign is developed, state relay programs will require time to arrange for funding of their own outreach efforts and make appropriate arrangements with advertising agencies to perform those duties. In light of these

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(Footnote continued from preceding page)

> does not include other issues, such as TRS service quality. See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67. Notice of Proposed Rulemaking, 13 FCC Rcd 14187, 14127-28 (1998)(¶ 78).

considerations, the Commission should not impose new outreach criteria for TRS program certification for any state until after implementation of the national outreach program.

IV. Provision of Additional Features and Services

Finally, the Further Notice (¶ 138) tentatively concludes that that a wide variety of additional services and features should be required of TRS providers to make relay service functionally equivalent to traditional voice offerings.[15] Additionally, the Commission requests comment (id., ¶¶ 139-146) on the desirability of supporting additional protocols, such as V.18 and T.140, for relay service.

AT&T strongly urges the Commission to defer any expansion of TRS services and feature requirements until after TRS providers complete a study of reconfiguring relay centers as an integral part of the public switched network, discussed in Part II, supra. Many of these additional functions can far more readily be provided using the SS7 protocol and other capabilities resident within carrier networks, and their deployment could take place naturally once TRS has been redesigned as part of the public network. Although this network integration will be expensive, the sequence at supports will avoid duplicative expenditure of substantial

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15 The additional services that the Further Notice proposes be required include two-line VCO, voice to text (VTT), two line HCO, reverse VCO, reverse HCO, VCO to TTY, VCO to VCO, HCO to TTY, and HCO to HCO. Additional features that would be mandated under the Further Notice include call release, automatic call forwarding, interrupt capability, answering machine retrieval, extended community call blocking, pay per use feature blocks, call waiting, return call and call back, three way calling, speed dialing, distinctive ring, and repeat dialing. Id., ¶138.

funds to upgrade current TRS centers that reside outside the public switched network to provide all of the additional services and features identified in the Further Notice.[16] Additionally, full network integration will better enable TRS to take advantage of all new features as telecommunications networks further bridge into the Internet.

AT&T also strongly urges the Commission not to mandate V.18 and T.140; those international protocols have only limited applicability in the United States TRS market and are also Customers Premises Equipment ("CPE") dependent. More generally, AT&T urges the Commission to refrain from proliferating additional analog text transmission protocols (especially those that are proprietary to the terminal equipment manufacturer) with which TRS providers must maintain compatibility. As shown above (p. 3 and n. 6), TRS providers must already contend with a wide variety of text transmission protocols that magnify the cost, complexity and speed of serving relay traffic. Instead of exacerbating this situation, the Commission should take steps to prescribe a fixed standard set of protocols, followed ultimately by a single standard protocol, for text transmission for relay service. AT&T submits that internet protocol ("IP") may be best suited for this standard, because it is non-proprietary and less CPE dependent, and because it assure

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16 Pending the fundamental redesign of TRS to provide these functions as part of the network, TRS providers may of course provide those offerings in response to customer demand, in order to make their relay services more attractive to customers in a competitive marketplace.

compatibility between TRS and advanced communications services emerging elsewhere in the marketplace.[17]

CONCLUSION

For the reasons stated above, AT&T urges the Commission to modify its proposals in the Further Notice in accordance with these comments.

Respectfully submitted,

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[17] AT&T believes that the TRS landscape should reflect changes in the overall telecommunications marketplace. Thus, as the rest of the telecommunications industry evolves from a dual (analog and digital telephony) modality into the Internet, and as TRS service transitions in response to that development, AT&T recommends that the Commission provide cost recovery for all IP-related TRS using the established funding mechanism..